

REMARKS

Claim 1 is pending in the present application. Claim 1 is canceled and claims 2-21 were added. Reconsideration of the claims is respectfully requested.

I. 35 U.S.C. § 112, Second Paragraph

The examiner has rejected claim 1 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter, which applicants regard as the invention. This rejection is respectfully traversed. However, this claim has been cancelled and therefore the rejection of this claim is moot.

II. 35 U.S.C. § 102, Anticipation

Prior to discussing the specific rejections, it is submitted that the needs of a media library, to which the present application is directed, are different from the needs of a supplier who is shipping goods to a customer. Such a supplier, as exemplified by the references relied on, is receiving goods on one side of a distribution area and dispensing the goods on the other side. The goods will never be returned to their starting place, each item is moved once and permanently leaves the area, do not return to their origin, and there is little change for contention between robots, as only one robot appears to serve a particular area. In contrast, the items in a media library move from storage to a media player and back again to their storage position and the same item of media may be used numerous times. There is also the possibility of contention between robots, since it is possible for multiple robots to serve the same media player or region of storage. It is submitted that these distinctions are reflected in the claims in the specific recitation of media units, media players, and in the very concept of a media library. The specific rejections will now be examined in order to show the specific differences over the prior art.

Rejection over Maekawa

The examiner has rejected claim 1 under 35 U.S.C. § 102 as being anticipated by Maekawa (U.S. Patent No. 4,850,783). This rejection is respectfully traversed.

Maekawa discloses a palletizing system in which a robot arm removes cases of articles from a number of temporary storage locations and loads the cases onto a pallet that moves alongside the robot arm.

The newly added claims more clearly describe the claimed library, which include features not shown in Maekawa. For example, Claim 2 recites,

2. (New) A media library, comprising:

a first enclosure containing a first plurality of horizontal trays, said first plurality of horizontal trays containing a first array of media elements that are connected to be carried between said first plurality of horizontal trays and a plurality of media players by a first robot;

a second plurality of horizontal trays contained within a second enclosure, said second plurality of horizontal trays containing a second array of media elements that are connected to be carried between said second plurality of horizontal trays and said plurality of media players by a second robot, wherein said plurality of media players are contained in at least one of said first enclosure and said second enclosure; and

a mechanism that carries media elements between said first enclosure and said second enclosure along a cross-enclosure guide rail.

It is asserted that Maekawa does not disclose that the storage area includes media players included within the enclosures, nor that the storage library contains media elements, such as tapes. Maekawa does not disclose that that media elements are carried between storage and media players by robots nor that each enclosure contains at least one robot. Maekawa thus does not anticipate this claim or its dependent claims.

Additionally, new Claim 13, which describes the library in a somewhat different manner than Claim 2, also includes limitations not found in Maekawa. This claim reads,

13. (New) A media library comprising:
a plurality of robotic units configured to carry media units to and from a media player;
a plurality of media storage trays, each having an array of media elements that are inserted and removed vertically;
a plurality of storage units, each having a first pair of rails configured to carry ones of said plurality of media storage trays and a second pair of rails arranged to carry ones of said robotic units, said robotic units being configured to access ones of said media elements stored in said media storage trays;
a first enclosure that contains a first group of said plurality of storage units, which are arranged in rows and columns, and a first one of said plurality of robotic units;
a second enclosure that contains a second group of said plurality of storage units, which are arranged in rows and columns, and a second one of said plurality of robotic units; and
a mechanism that carries ones of said plurality of media elements between said first enclosure and said second enclosure.

It is submitted that Maekawa does not disclose that the library contains media elements, nor does it disclose that robotic units carry media elements to and from a media player. Maekawa does it disclose that each storage unit contains rails both for media storage trays and for robotic units, nor does it disclose that each enclosure contains a robotic unit. Thus, Maekawa does not anticipate this claim or its dependent claims, either.

Rejection over Savigny

The examiner has also rejected claim 1 under 35 U.S.C. § 102 as being anticipated by Savigny (U.S. Patent No. 5,478,183). This rejection is respectfully traversed.

Regarding Claim 2 and its dependent claims, it is asserted that Savigny does not disclose that the library includes media players nor that the library contains media elements, such as tapes. Savigny does not disclose that items are carried between the enclosures on rails nor that the media elements are carried between storage and media players by robots. Savigny thus does not anticipate this claim or its dependent claims.

Regarding Claim 13 and its dependent claims, it is submitted that Savigny does not disclose that the library contains media elements, nor does it disclose that each storage unit contains rails for media storage trays, nor does it disclose that the robotic units are configured to carry media units to and from media players. Thus, Savigny anticipates neither this claim nor its dependent claims.

Therefore, the rejections of the claims under 35 U.S.C. § 102 has been overcome.

Furthermore, neither Maekawa nor Savigny teaches, suggests, or gives any incentive to make the needed changes to reach the presently claimed invention. It is submitted that one of ordinary skill in the art would not be led to modify either Maekawa or Savigny to reach the present invention when these references are examined as a whole.

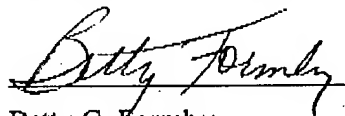
III. Conclusion

It is respectfully urged that the subject application is patentable over both Maekawa and Savigny and is now in condition for allowance.

The examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,



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